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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JAN 17 2017

INFORMATION REQUEST
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Miles Family Holdings LLC
(Miles Scientific Corporation)
75 Blue Hen Drive
Newark, DE 19713

Re: Letter Requiring Submission of Information
Newark South Ground Water Plume Site,
Newark, New Castle County, Delaware

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) is seeking information concerning a release, or threat of release, of hazardous substances, pollutants or contaminants into the environment at the Newark South Ground Water Plume Site, located in southeast Newark, west of Route 72, between Interstate 95 and Rt. 2 (East Chestnut Hill Road) in New Castle County, Delaware, (hereinafter the Site). The Site is a contaminated groundwater plume located southeast of Newark, Delaware. The Site is generally located under four industrial parks - the Diamond State, Delaware Industrial, Cooches Industrial Park and Blue Hen Industrial Park, and also one commercial, retail center, Pencader Plaza. Refer to Enclosure G, attached to this letter, for a map. The specific information required is attached to this letter as Enclosure E.

Investigative activities have revealed that municipal wells, supplying drinking water for the City of Newark, are contaminated with perchloroethylene (PCE), trichloroethylene (TCE), solvents and other hazardous compounds. Properties located within the Site area and on adjacent areas surrounding the Site may have or had detections of contamination in the groundwater and soils. Therefore, EPA is conducting a search for Potentially Responsible Parties (PRPs) in connection with the contaminated groundwater plume and source areas.

EPA's investigation revealed that Miles Family Holdings LLC (hereinafter you) owns that portion of the Site property which is located at 75 Blue Hen Drive (11-006.30-303), Newark, Delaware 19713). Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9604(e), EPA has the authority to require you to furnish all information and documents in your possession, custody or control,

Miles Scientific

Miles Scientific Corporation
75 Blue Hen Drive
Newark DE 19713

Answers to Enclosure E (Information Request)

1) The current nature of the business is the manufacturing of Thin Layer Chromatography (TLC) plates and accessories as well as a few other related products in the chromatography field.

2) The nature of the business during my (Steven Miles) ownership (AUG 2015 – present) was the same as in question 1 and has been the same since the company, as Analtech, Inc., moved to this location (from Wilmington) in 1970. The only products added over the years from 1970 on have not been chemical in nature.

3) At the property:

   a) We produce Thin Layer Chromatography (TLC) plates, solid phase extraction (SPE) columns, modified bulk silica gel, and non-consumable accessories supporting the previously mentioned products.

   b) During my ownership of the property: AUG 2015 – present; before my ownership (1970 – AUG 2015).

   c) The process used to make TLC plates involves mixing ingredients in a blender making a "milk shake" like mixture. The mixture is then poured into a special trough located overtop of a moving conveyor belt. The conveyor belt is covered with small (8"x8") sheets of glass. As the conveyor moves the glass down the belt, a thin coating of the mixture is applied to the glass. The coated glass sheets are moved to racks which are place on a cart. When the rack is full the cart is placed inside a walk-in dryer for a set period (30-120 mins). The dried plates are hand inspected and boxed and labeled. They are then ready to ship to a customer upon receiving an order. This is about 85% of our business, making plates such as these. We manufacturer over 500 varieties with the main difference coming from the final size of the plates, the thickness of the coated layer, the pre-scored pattern on the glass, or other special features of plates.

      The process to make SPE columns is to pack the same type powders listed

above into various size plastic enclosures. The enclosures are then packed into a box, and labeled before for sale.

The process to make modified bulk silica gel typically involves a chemical reaction carried out either in a small (10 liter) glass vessel or in a larger (100 liter) plastic vessel. Both reactions are monitored by a chemist (or someone trained by a chemist) under or inside a fume hood.

Other products that we make are machines or small accessories that are assembled in-house or even purchased outright from another manufacturer and simply resold by us.

4) Yes, we have had to deal with waste of various types.

a) Solids: Silica gel, calcium sulfate, zinc ortho-silicate, aluminum oxide, microcrystalline cellulose, diatomaceous earth
Liquids: hexane, methanol, aqueous sodium chloride

b) The waste is generated by various staff members in the process of doing their jobs.

c) All items listed were purchased in bulk quantities (drums or small container sizes). All are stored and clearly labeled in a temperature controlled warehouse. All are handled by trained personnel using appropriate personal protection. Disposal of residual amounts of these products is in the form of a slurry (solid/liquid mixture) when rejected materials are washed and flushed with a hot water process.

d) We keep a stock of materials based on demand. Depending on the existing demand some materials may be purchased only every few years others are delivered monthly. The same explanation goes for the use and potential disposal of these same items.

e) All materials are used on the premises of 75 Blue Hen Drive. Some manufacturing takes place in the main plant production room. Others occur in the lab.

f) The quantity of waste purchased as solid raw materials is as follows:

Silica Gel – purchased in 20kg drums (about 60-80 drums per year)
Calcium Sulfate – purchased in 25kg drums (about 13 drums per year)
Zinc ortho-silicate – purchased as 50kg once per year
Aluminum oxide – purchase 30-50 kg per year

Microcrystalline cellulose – purchase about 50 kg every 2.5 years
Diatomaceous earth – purchase about 20 kg every 1.5 years

The amount of these materials that become waste is based on how much product that gets rejected during production. These rejects are divided into two categories (re-washable and non-re-washable). The non-re-washable rejects are tossed in the regular trash since the coating is adhered to the glass backing too well to reclaim the glass by washing the coating off. The washable rejects are soaked in a water bath to loosen the coating from the glass. After a period of soaking the coated glass sheets are fed into a hot water, conveyor-fed glass washer. The materials that are washed off are flushed down the drain.

The approximate quantities of each listed solid waste material that are disposed of over the course of a year are as follows:

Silica Gel – 0.25 kg/day x 208 work days/year = 52kg (75% re-washable)
Calcium sulfate – 0.025 kg/day x 208 work days/year = 5.2kg (75% re-washable)
Zinc ortho-silicate – 0.006 kg/day x 208 work days/year = 1.2kg (75% re-washable)
Aluminum oxide – 0.008 kg/day x 208 work days/year = 1.7kg (75% re-washable)
Microcrystalline cellulose – 0.003 kg/day x 208 work days/year = 0.6kg (75% re-washable)
Diatomaceous earth – 0.002 kg/day x 208 work days/year = 0.4kg (75% re-washable)

The quantity of waste purchased as liquid raw materials is as follows:

Methanol – purchase 2x 55 gallon drums per year
Hexane – purchase 1x 55 gallon drum per year

The approximate quantities of each listed liquid waste material that are disposed of over the course of a year are as follows:

Methanol – used in the modified silica gel manufacturing is about 40 gallons per year. In each manufacturing batch (2x per year) we use about 20 gallons of methanol. The batch process takes about 2-3 weeks to complete. During that time about 90% of the methanol (about 18 gallons) is flushed down the drain along with water. The other 10% evaporates into a fume hood. Methanol other than that used for this process (remaining 70 gallons is used in our TLC plate manufacturing process during a year) eventually evaporates

after the coating process.

Hexane – used in the modified silica gel manufacturing is about 20 gallons per year. In each manufacturing batch (2x per year) we use about 10 gallons of hexane. The batch process takes about 2-3 weeks to complete. During that time about 80% of the hexane (about 8 gallons) is flushed down the drain along with water. The other 20% evaporates into a fume hood.

5) We do not use PCE. All methods used to dispose of solvents used on the premises were described above in Q4.

6) All info in the question pertains to the handling of the 2 solvents (methanol, hexane) that we purchase, store, use, and dispose of at our company.

Steven Miles – President/owner
Edward Dugan – Technical Director (responsible for purchasing and using and disposing of the methanol and hexane for the manufacture of modified silica gel)
Terry McVey – Production Manager (responsible for the safe storage of the methanol and hexane)
Vince Morris – shipper/logistics (responsible for receiving and inspecting the received methanol and hexane)
Brian Denning – production technician (responsible for the low level use of methanol during manufacturing of TLC plates)
Gerry McVey (responsible for the low level use of methanol during manufacturing of TLC plates)
Chris Liskey (responsible for the low level use of methanol during manufacturing of TLC plates)

All people above may be reached at 302-737-6960.

7) I have owned this property from AUG 26, 2015 to present. When I purchased the business, it was split into 1) the property and building (owned by Miles Family Holdings LLC) and 2) the business (Miles Scientific – previously known as Analtech Inc.). Before purchasing the business, I was an employee for 28+ years.

8) The prior owner of the property (and the business run in it) was Analtech Inc. The property was built by Analtech Inc. in 1970. The business was the same as it is now (manufacturing TLC plates and other misc. chromatography products).

During the period before Miles Family Holdings LLC bought the property and

Miles Scientific took over running the business of Analtech, Inc., the same manufacturing was being done, thus the same waste substances.

9) The purchase of the building, land, and business by Miles Family Holdings LLC and Miles Scientific (on AUG 26, 2015) was done by a loan from the previous owners. The agreement is that the loan will be paid off by the end of 2021 or the business and property would revert to their ownership. The loan is currently being paid back to the Kenneth Rainin Charitable Lead Annuity.

10) The reason for purchasing the Property (and the business) was to save the business and the jobs of every employee there. The company (Analtech Inc) had been successfully doing business since 1961 and had many long-term employees. The two owners of the business had died (2007 and 2012) and the trustees of the estate could not find a viable buyer for the business that was willing to keep it at the same location. They made me (Steven Miles) an offer (JAN 2015) involving them loaning me the money, short-term, to purchase the business in order to keep it going.

11) Contractors that have worked on the property include:

Accountants (monthly or yearly)
Water.filtration company (semi-annually or as needed)
Compressor maintenance company (quarterly)
Oil heater maintenance and refill companies (semi-annually or as needed)
HVAC inspection and maintenance company (semi-annually or as needed)
Fire Safety & Inspection company (yearly)

12) No construction or demolition has occurred on the premises during my ownership.

13) All this information has been described in previous questions.

14) We have not required any environmental permits during my ownership or during the one previous ownership.

15) Besides the fact that the City of Newark regularly takes water samples from our facility (since we are conveniently located near the end of the city limits), I had a complete environmental site survey completed.

16) There have been no leaks, spills, or releases at the property, that may have been hazardous, toxic, flammable, reactive, or corrosive during my period of ownership or during the entire period during which the business has existed at

this site (1970 – present).

17) There have been no fires, explosions, or similar occurrences at the property during my period of ownership or during the entire period during which the business has existed at this site (1970 – present).

18) There have been no governmental inspections during my period of ownership. We have yearly fire and safety inspections by a third party. This is for purposes of gaining a discount on our property and business insurance.

19) [redacted]

20) All information pertaining to waste and who has handled it has already been shared in previous questions.

21) There were no predecessors in interest during my term of ownership.

I purchased the business and the land on the same day (AUG 26, 2015) and since then have only run the business under Miles Scientific on the property.

22) When I acquired the property on AUG 26, 2015 (under Miles Family Holdings LLC), I acquired the business (Analtech, Inc.) the same day in an asset purchase (under Miles Scientific). The business had been running with the same raw materials and manufacturing practices before the purchase just as after the change of ownership.

23) As mentioned previously in Q15, I had a complete environmental site survey performed before proceeding with the property and business purchase.

24) I did not acquire the property by inheritance or bequest.

25) See below

a) The purchase price of the property and the business together was $1,250,000.

b) The purchase price was fair based on the fact that the business had been trending down for the last 5+ years.

26) Steven Miles (President & General Manager) has had oversite over all operations since the new ownership transition on AUG 26, 2015.

27) Edward Dugan (Technical Director) supervises the quality control of the production of all TLC plates that the company manufactures.
Terry McVey (Production Manager) supervises the manufacturing staff for all TLC plates that the company manufactures.

28) Steven Miles (President & General Manager, 302-737-6960), 75 Blue Hen Drive Newark DE 19713.

29) Edward Dugan helped supply information for answering question #4. (Technical Director, 302-737-6960), 75 Blue Hen Drive Newark DE 19713. All other questions were completed by Steven Miles only.

Due to the overwhelming size of the potential proof documents it was not practical to reproduce and mail them along with this report. Any required proof documents will be available in a shared dropbox folder or other shared virtual storage location of your choice. Please contact me directly for access to these shared files.

Steven C. Miles
302-737-6960 x112
302-750-8646 (cell)